

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<p>In re:     Robert J. Waldron, Jr.                  Debtor                   and                   Thomas Cunningham, Carolyn Cunningham, Elizabeth A. Walsh, Elizabeth A. Walsh, Donna M. Waldron, and Mary T. Kane                   Co-Debtors  LoanCare, LLC, or its Successor or Assignee                  Movant                   vs.  WILLIAM C. MILLER, Esq. Robert J. Waldron, Jr. Thomas Cunningham, Carolyn Cunningham, Elizabeth A. Walsh, Elizabeth A. Walsh, Donna M. Waldron, and Mary T. Kane                   Respondents</p>	<p>Chapter 13 Bankruptcy No. 17-16763-elf</p>
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**NOTICE OF MOTION, RESPONSE DEADLINE  
AND HEARING DATE**

LoanCare, LLC or its Successor or Assignee, has filed a Motion for Relief from the Automatic Stay with the court for requesting Relief from the automatic stay as to property at 3245 Bay Avenue, Ocean City, New Jersey 08226.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before March 11, 2021 you or your attorney must do all of the following:

- (a) file an answer explaining your position at  
  
United States Bankruptcy Court  
For the Eastern District of Pennsylvania  
900 Market Street  
Suite 400  
Philadelphia, Pennsylvania 19107

If you mail your answer to the Bankruptcy Clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

- (b) mail a copy to the Movant's attorney:  
  
Lauren M. Moyer, Esquire

McCabe, Weisberg & Conway, LLC  
123 S. Broad Street, Suite 1400  
Philadelphia, PA 19109  
Phone: 215-790-1010  
Fax: 215-790-1274

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Eric L. Frank on March 23, 2021 at 9:30 a.m. in United States Bankruptcy Court, 900 Market Street, Suite 400, Philadelphia, Pennsylvania 19107.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office to find out whether the hearing has been canceled because no one filed an answer.

Date: February 25, 2021